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October 27, 2023

**VIA ECF**

The Honorable J. Brendan Day, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Federal Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Edible IP, LLC et al v. World Media Group, LLC*  
Case No. 3:20-cv-19178-MAS-JBD  
Joint Status Letter

Dear Magistrate Judge Day:

This firm represents Defendant World Media Group, LLC in the above-referenced action. We write jointly with newly appointed counsel for Plaintiffs to provide a status update as directed in Your Honor's Order of August 21, 2023. Counsel for Plaintiffs reviewed this letter prior to its submission.

Discovery has not progressed since the status conference before Your Honor that took place on July 31, 2023. The parties initially continued settlement discussions. On August 10, 2023, Defendant provided a revised proposed settlement agreement to Plaintiffs' counsel. Defendant has not received a response.

On September 26, 2023, Defendant sent email correspondence to Plaintiffs' counsel identifying the remaining depositions Defendant wished to take, and requesting available dates within the months of October and November. Having not received a response, on October 9, 2023, Defendant sent formal Notices of Deposition to counsel for Plaintiff. On October 19, 2023, Defendant received email correspondence from Mr. Wiech stating that the BakerHostetler firm would be entering an appearance on behalf of Plaintiffs and requesting a discussion the following week. Discussion of the history of settlement negotiations and discovery occurred between Defendant's counsel and newly appointed counsel for Plaintiffs on October 25, 2023.



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As newly appointed counsel for Plaintiffs, BakerHostetler, specifically Jason S. Oliver and Christopher A. Wiech, intend to request a modest extension of the remaining fact discovery period. Messrs. Oliver and Wiech, respectively, will be entering an appearance and moving for admission *pro hac vice*. Plaintiffs' counsel are asking for approximately two additional months, until January 19, 2024, to familiarize themselves with the facts and circumstances of the case and to work with Defendants' counsel to resolve all outstanding discovery issues and complete all remaining discovery. Plaintiffs do not seek additional time to delay this case, but rather for their new counsel to adequately prepare so that they can expeditiously move this case along to a litigated conclusion.

We thank the Court for its continued assistance with this matter.

Respectfully submitted,

LERNER DAVID LLP  
Attorneys for Defendant/Counterclaim  
Plaintiff World Media Group, LLC

By:

A handwritten signature in blue ink that reads "Gregg A. Paradise".

Gregg A. Paradise

cc: All counsel of record (via ECF service)